

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SJUNDE AP-FONDEN and THE  
CLEVELAND BAKERS AND  
TEAMSTERS PENSION FUND,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY, et al.,

Defendants.

17 Civ. 08457 (JMF) (GWG)

**NOTICE OF MOTION FOR CLASS CERTIFICATION**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that the undersigned attorneys for Lead Plaintiff Sjunde AP-Fonden and Additional Plaintiff The Cleveland Bakers and Teamsters Pension Fund (“Plaintiffs”) hereby move before the United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, for an order as follows:

- (1) certifying this action as a class action pursuant to Federal Rules of Civil Procedure 23(a) and 23(b)(3), with the class (“Class”) defined as follows:

All persons and entities that purchased or acquired GE common stock between March 2, 2015 and January 23, 2018, inclusive (the “Class Period”) and were damaged thereby, excluding (a) Defendants; (b) GE’s subsidiaries and affiliates; (c) any officer, director, or controlling person of GE, and members of the immediate families of such persons; (d) any entity in which any Defendant has a controlling interest; (e) Defendants’ directors’ and officers’ liability insurance carriers, and any affiliates or subsidiaries thereof; and (f) the legal representatives, heirs, successors, and assigns of any such excluded party;

- (2) appointing Plaintiffs as Class Representatives of the proposed Class; and
- (3) appointing Kessler Topaz Meltzer & Check, LLP, as Lead Counsel for the Class and Grant & Eisenhofer P.A. as Liaison Counsel for the Class;

PLEASE TAKE FURTHER NOTICE that a Memorandum of Law, Declaration of Sharan Nirmul and exhibits thereto, are submitted herewith in support of this application.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

Dated: May 21, 2021

Respectfully submitted,

**KESSLER TOPAZ MELTZER &  
CHECK, LLP**

*S/ Sharan Nirmul*

Sharan Nirmul

Gregory M. Castaldo

Richard A. Russo, Jr.

Joshua A. Materese  
Michelle M. Newcomer  
Evan R. Hoey  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: (610) 667-7706  
snirmul@ktmc.com  
gcastaldo@ktmc.com  
rrusso@ktmc.com  
jmaterese@ktmc.com  
mnewcomer@ktmc.com  
ehoey@ktmc.com

*Counsel for Lead Plaintiff Sjunde AP-  
Fonden and Proposed Lead Counsel for the  
Class*

**GRANT & EISENHOFER P.A.**

Jay W. Eisenhofer  
Daniel L. Berger  
Barbara Hart  
Caitlin M. Moyna  
Jonathan D. Park  
485 Lexington Avenue  
New York, NY 10017  
Telephone: (646) 722-8500  
jeisenhofer@gelaw.com  
dberger@gelaw.com  
bhart@gelaw.com  
cmoyna@gelaw.com  
jpark@gelaw.com

*Counsel for Additional Plaintiff Cleveland  
Bakers and Teamsters Pension Fund and  
Proposed Liaison Counsel for the Class*